

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
QHC FACILITIES, et al¹)	Case No. 21-01643-als11
)	
Debtors and Debtors in Possession)	Hon. Anita L. Shodeen
)	
)	
)	STIPULATION AND AGREED ORDER
)	RE MOTION FOR STAY
)	
_____)	No Hearing Set

COMES NOW, QHC Facilities, LLC and its above-referenced affiliates (the “Debtors” or “QHC”), Debtors and Debtors in Possession herein, by and through their undersigned counsel, and Cedar Healthgroup, LLC (“Cedar”) by and through its undersigned counsel, respectfully stipulate as follows:

1. On February 7, 2023, the Debtors filed a Notice of Appeal and Statement of Election (Docket No. 601) and an Emergency Motion for Stay Pending Appeal of the Order Granting Summary Judgment in Favor of Cedar Healthgroup, LLC (Docket No. 602).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. Without waiving or conceding any and all arguments, rights, and remedies with respect to the Appeal or the Emergency Motion, the parties agree to a stay pending appeal of the Order granting summary judgment in favor of Cedar.

¹ The Jointly Administered Debtors in this proceeding are *In re QHC Management, LLC* (Case No. 21-01644-als11), *In re QHC Mitchellville, LLC* (Case No. 21-01645-als11), *In re QHC Winterset North, LLC* (Case No. 21-01646-als11), *In re QHC Madison Square, LLC* (Case No. 21-01647-als11), *In re QHC Fort Dodge Villa, LLC* (Case No. 21-01648-als11), *In re QHC Crestridge, LLC* (Case No. 21-01649-als11), *In re QHC Crestview Acres Inc.* (Case No. 21-01650-als11), *In re QHC Humboldt North, LLC* (Case No. 21-01651-als11), *In re QHC Humboldt South, LLC* (Case No. 21-01652-als11) and *In re QHC Villa Cottages, LLC* (Case No. 21-01653-als11).

2. The Debtors shall transfer the \$605,000 deposit (the “Deposit”) into an interest-bearing escrow account at Axos bank and such Deposit shall remain in the interest-bearing account until resolution of the Appeal. Any accrued interest shall be for the benefit of the prevailing party on Appeal.

3. The Debtors are not required to post a bond.

GOOD CAUSE APPEARING, IT IS SO ORDERED

UNITED STATES BANKRUPTCY JUDGE

Approved as to Form and Content:

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